# IN THE UNITED STATES BANKRUPTCY COURT FOR WESTERN DISTRICT OF PENNSYLVANIA

IN RE: Cheri E. Morgan

CASE NO.: 24-70091-JAD

Debtor

CHAPTER 13

SN Servicing Corporation as servicer for U.S. Bank Trust National Association, as Trustee for BM-SC Series I Trust

Judge: Jeffery A. Deller

v.

Hearing Date:

Cheri E. Morgan Ronda J. Winnecour

Respondents

Objection Deadline:

#### NOTICE OF APPEARANCE

PLEASE TAKE NOTICE that the undersigned hereby appears in the above-captioned Chapter 13 case on behalf of SN Servicing Corporation as servicer for U.S. Bank Trust National Association, as Trustee for BM-SC Series I Trust, and hereby requests that all notices given or required to be given in these cases, and all papers served or required to be served in these cases, be given to and served upon the following:

### FRIEDMAN VARTOLO LLP

Attorneys for SN Servicing Corporation as Servicer for U.S. Bank Trust National Association, as Trustee for BM-SC Series I Trust 1325 Franklin Avenue, Suite 160 Garden City, NY 11530 Bankruptcy@FriedmanVartolo.com

**PLEASE TAKE FURTHER NOTICE** that the foregoing demand includes all pleadings of any kind including, without limitation, all notices, motions, complaints, and orders, whether written or oral, formal, or informal, however transmitted, related in any way to the debtor, its property or its estates. The persons listed above request that their names and addresses be added to the mailing matrix.

PLEASE TAKE FURTHER NOTICE that neither this Notice of Appearance and Demand for Service of Papers nor any later appearance, pleading, proof of claim, claim, or suit shall constitute a waiver of (i) the right to have final orders in non-core matters entered only after de novo review by a District Judge, (ii) the right to trial by jury in any proceeding triable in this case or any case, controversy, or proceeding related to this case, (iii) the right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, (iv) any objection to the jurisdiction or venue of this Court for any purpose other than with respect to this Notice, (v) an election of remedy, or (vi) any other right, claim, defense, setoff, or recoupment, in law or in equity, under any agreement, all of which are expressly waived.

Dated: July 18, 2025

By: /s/ Lauren M. Moyer, Esq. Lauren M. Moyer, Esq. FRIEDMAN VARTOLO LLP Attorneys for Movant 1325 Franklin Avenue, Suite 160 Garden City, NY 11530 T: (212) 471-5100 F: (212) 471-5150

Bankruptcy@FriedmanVartolo.com

# IN THE UNITED STATES BANKRUPTCY COURT FOR WESTERN DISTRICT OF PENNSYLVANIA

IN RE: Cheri E. Morgan

Debtor

CASE NO.: 24-70091-JAD

SN Servicing Corporation as servicer for U.S. Bank Trust National Association, as Trustee for BM-SC Series I Trust

v.

Judge: Jeffery A. Deller

Hearing Date:

CHAPTER 13

Ronda J. Winnecour - Bankruptcy Trustee
Respondents

Objection Deadline:

#### CERTIFICATE OF SERVICE OF NOTICE OF APPEARANCE

I certify under penalty of perjury that I served the above captioned pleading on the parties at the addresses specified below or on the attached list on July 18, 2025.

The type(s) of service made on the parties (first-class mail, electronic notification, hand delivery, or another type of service) was first-class mail and electronic notification.

If more than one method of service was employed, this certificate of service groups the parties by the type of service. For example, the full name, email address, and where applicable the full name of the person or entity represented, for each party served by electronic transmission is listed under the heading "Service by NEF," and the full name and complete postal address for each party served by mail, is listed under the heading "Service by First-Class Mail."

### **EXECUTED ON:**

By: /s/ Lauren M. Moyer, Esq. Lauren M. Moyer, Esq. FRIEDMAN VARTOLO LLP Attorneys for Movant 1325 Franklin Avenue, Suite 160 Garden City, NY 11530 T: (212) 471-5100 F: (212) 471-5150

Bankruptcy@FriedmanVartolo.com

## Service by Regular Mail

Cheri E. Morgan 230 France Street Sproul, PA 16682 Bankruptcy Debtor

## **Service by NEF**

James M. McClure, Esq. 113 Fourth Street Huntingdon, PA 16652 *Attorney* 

Ronda J. Winnecour 600 Grant Street, Suite 3250, USX Tower Pittsburgh, PA 15219 *Bankruptcy Trustee* 

U.S Trustee 1000 Liberty Avenue Suite 1316 Pittsburgh, PA 15222 *United States Trustee*